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12 *Attorneys for Debtors*
13 *and Reorganized Debtors*

14 **UNITED STATES BANKRUPTCY COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **SAN FRANCISCO DIVISION**

17 **In re:**

18 **PG&E CORPORATION,**

19 **- and -**

20 **PACIFIC GAS AND ELECTRIC**
21 **COMPANY,**

22 **Debtors.**

- 23 ☐ Affects PG&E Corporation
24 ☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

25 ** All papers shall be filed in the Lead Case,*
26 *No. 19-30088 (DM).*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**STIPULATION CONFIRMING
APPLICATION OF CONFIDENTIALITY
AND PROTECTIVE ORDER TO TUSCAN
RIDGE DISPUTES**

Related Docket Nos. 11066 and 11288

[No Hearing Date Requested]

PG&E Corporation and Pacific Gas and Electric Company, as debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), Tuscan Ridge Associates, LLC (“**TRA**”), and Fulcrum Credit Partners LLC (“**Fulcrum**”) (each a “**Party**” and collectively, the “**Parties**”) by and through their respective counsel, hereby submit this stipulation (the “**Stipulation**”) for an Order confirming the application of the *Confidentiality and Protective Order* [Docket No. 3405] (as modified, supplemented and amended by the *Order on the Fire Victim Trustee’s Application for Clarification and Modification of Protective Order* dated August 4, 2020 [Docket No. 8662], the “**Protective Order**”) to Discovery Materials¹ in connection with certain Tuscan Ridge Disputes (as defined below). The Parties hereby stipulate and agree as follows:

RECITALS

A. On August 7, 2019, the Court entered the Protective Order to govern the production, review, disclosure, and handling of Discovery Materials by any person or entity in connection with the Chapter 11 Cases.

B. On June 20, 2020, the Court entered an Order [Docket No. 8053] (the “**Confirmation Order**”) confirming the *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated June 19, 2020* [Docket No. 8048] (the “**Plan**”). The Plan became effective on July 1, 2020 [Docket No. 8252] (the “**Effective Date**”).

C. On or about October 17, 2019, TRA filed Proof of Claim, No. 58562 which TRA transferred to Fulcrum on or about March 16, 2021 [Docket No. 10437] (the “**Claim**”).

D. On August 17, 2021, Fulcrum and TRA filed the *Motion for Relief from Plan Injunction, to Compel Arbitration and/or for Abstention* [Docket No. 11066] (the “**Motion**”).

E. On September 22, 2021, the Reorganized Debtors filed the *Reorganized Debtors’ Objection to Proof of Claim No. 58562 Filed by Fulcrum Credit Partners LLC as Transferee of Tuscan Ridge Associates, LLC* [Docket No. 11288] (the “**Objection**,” and together with the Claim and the Motion, the “**Tuscan Ridge Disputes**”).

¹ Capitalized terms used but not herein defined shall have the meanings ascribed to them in the Protective Order.

1 F. On December 1, 2021, the Court held a status conference on the Motion and the
2 Objection. A further scheduling conference is scheduled for April 12, 2022.

3 G. The Parties have agreed that the Protective Order shall govern Discovery Material
4 produced by the Parties or third-party witnesses in connection with the Tuscan Ridge Disputes.

5 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
6 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
7 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**
8 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**
9 **THAT:**

10 1. The Parties acknowledge and agree that, notwithstanding anything to the contrary
11 therein, the terms of the Protective Order shall govern and apply to any Discovery Material
12 produced by the Parties or third-party witnesses in connection with the Tuscan Ridge Disputes.

13 2. Nothing in this Stipulation is intended to nor shall it affect, amend, modify, or
14 supplement the provisions of the Protective Order.

15 3. This Stipulation shall constitute the entire agreement and understanding of the
16 Parties relating to the subject matter hereof and shall supersede all prior agreements and
17 understandings relating to the subject matter hereof.

18 4. This Stipulation may be executed in counterparts, each of which shall be deemed an
19 original but all of which together shall constitute one and the same agreement.

20 5. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or
21 controversies arising from this Stipulation and the order approving this Stipulation.

22 *[Signatures on Next Page]*
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1 **Dated: April 6, 2022**

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